

**UNITED STATES BANKRUPTCY COURT
DISTRICT OF DELAWARE**

In re:

Case No. 21-11269-JKS

NLG, LLC,
a Delaware LLC
Debtor

Chapter 7

**APPELLANT CHRIS KOSACHUK’S DESIGNATION OF THE RECORD AND
STATEMENT OF ISSUES ON APPEAL**

Appellant Chris Kosachuk (“Kosachuk” or “Appellant”), *pro se*, and pursuant to Rule 8009 of the Federal Rules of Bankruptcy Procedure, hereby files his Designation of the Record and Statement of Issues on Appeal with respect to Appellant’s Notice of Appeal [Doc. 169], and requests that the same be transmitted electronically to the United States District Court for the District of Delaware.

Bankruptcy (BK)	Filing Date	Docket #	Docket Text/Document Description
BK	08/16/22	71	Motion to Convert
BK	08/17/22	72	Joint Motion
BK	08/30/22	77	Objection
BK	9/14/22	80	Order Granting Abeyance
BK	9/26/22	81	Adversary Complaint
BK	09/30/22	84	9019 Motion
BK	09/30/22	85	Exhibit
BK	10/17/22	86	Objection
BK	10/17/22	87	Objection
BK	11/3/22	92	Declaration
BK	11/3/22	93	Notice of Filing
BK	11/9/22	94	Hearing Transcript

BK	11/11/22	97	Objection
BK	11/14/22	98	Objection
BK	11/14/22	100	Hearing Transcript
BK	11/18/22	101	Order to Show Cause
BK	12/9/22	102	Response
BK	12/9/22	103	Response
BK	12/9/22	104	Response
BK	12/14/22	108	Notice of Withdrawal
BK	1/24/23	134	Opposition
BK	1/24/23	135 to 135-3	Objection & Exhibits
BK	1/24/23	136	Response
BK	2/1/23	141	Transcript
BK	2/16/23	143	Opinion
BK	2/16/23	144	Order
BK	3/3/23	157	Motion to Reconsider
BK	3/17/23	161	Opposition
BK	3/17/23	162	Opposition
BK	3/17/23	163	Opposition
BK	5/3/23	165	Opinion Order
BK	5/17/23	169	Notice of Appeal

STATEMENT OF ISSUES

1. Whether the Bankruptcy Court erred in entering order denying conversion when conversion was in the best interest of the creditors.

2. Whether the Bankruptcy Court should have dismissed the case.

Respectfully submitted,

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 26th day of September 2023 a true and correct copy of the foregoing was hand delivered to the Clerk of Court for electronic filing, which will electronically serve a copy of the foregoing document on all parties of record and was emailed directly to counsel of record by Appellant.

Respectfully submitted,



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SERVICE LIST

Served via CM/ECF or Email

All parties of record